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September 22, 2021

United States District Judge Alison J. Nathan U.S. District Court, Southern District 40 Foley Square
New York, New York 10007

Re:

LINZY v. UBER TECHNOLOGIES, INC.

Docket Number: 21-cv-05097 Our Client: Shaarille Linzy

Honorable Alison J. Nathan,

This correspondence is to memorialize a joint application by the parties requesting a 60-day extension of time to appear for the Initial Pretrial Conference, presently scheduled for October 1, 2021 and the filing of the Proposed Civil Case Management Plan and Scheduling Order, required to be filed by September 24, 2021, due to plaintiff's pending Motion to Remand pursuant to 28 USC §1447(E).

In the interests of judicial economy, the parties to this action request the aforementioned 60-day extension given that a decision on the motion could determine whether the foregoing would be necessary. It is respectfully requested that the Court endorse the above extension. No prior application for relief herein requested has been made.

Respectfully,

Matthew T. Gammons, Esq.

Cc: GOLDBERG SEGALLA LLP

Via ECF